

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

D.V.D.; M.M.; E.F.D.; and O.C.G.,

Plaintiffs,

v.

U.S. DEPARTMENT OF HOMELAND SECURITY;
Kristi NOEM, Secretary, U.S. Department of
Homeland Security, in her official capacity; Pamela
BONDI, U.S. Attorney General, in her official
capacity; and Antone MONIZ, Superintendent,
Plymouth County Correctional Facility, in his official
capacity,

Defendants.

Civil Action No. 25-cv-10676-BEM

**AUTHENTICATING DECLARATION OF TRINA REALMUTO
IN SUPPORT OF PLAINTIFFS' EMERGENCY MOTION FOR A TEMPORARY
RESTRAINING ORDER**

Pursuant to 28 U.S.C. § 1746, I hereby declare:

1. I am the executive director of the National Immigration Litigation Alliance. I am one of the counsel for Plaintiffs and class members in the above-captioned case. I submit this declaration in support of Plaintiffs' Emergency Motion for a Temporary Restraining Order.
2. I have personal knowledge of the facts set forth herein, and, if called as a witness, I could and would testify completely as set forth below.
3. Accompanying Plaintiffs' Motion as **Exhibits A1 – A8** are true and correct copies of media reporting regarding military flights to Libya, including a May 6, 2025 New York Times Article entitled "*Trump Administration Plans to Send Migrants to Libya on a Military Flight*"; a May 7, 2025 Reuters article entitled "*Exclusive: US may soon deport migrants to Libya on military flight, sources say*"; a May 7, 2025 BBC article entitled "*US may soon deport migrants to Libya - reports*"; a May 7, 2025 CNN article entitled "*Trump admin moving forward with plans to transport undocumented immigrants to Libya*"; a May 7, 2025 Independent article entitled "*Trump administration plans to send migrants to Libya's 'horrific' detention centers*"; a May 7, 2025 The Guardian article entitled "*US planning to deport migrants to Libya despite 'hellish' conditions - reports*"; a May 7, 2025 Newsweek article entitled "*Donald Trump Planning to Send Migrants to Libya: What We Know*"; and a May 6, 2025 CBS New article entitled "*Trump administration may soon deport migrants to Libya.*" **Exhibit A9** is a true and correct copy of an article regarding President Trump's upcoming travel to Saudi Arabia, an April 22, 2025 Politico article entitled "*Trump to visit Saudi Arabia, Qatar and UAE in May.*"
4. Accompanying Plaintiffs' Motion as **Exhibit B** is a true and correct copy of an email exchange between Plaintiffs' counsel and Jacqueline Dan, a Public Defender with the Orange County, California Public Defender and Tin Thanh Nguyen, Attorney with the Law Office of Tin

Thanh Nguyen, PLLC, indicating that “[U.S. Immigration and Customs Officers (ICE)] officers at the South Texas Detention Facility gathered 1 Vietnamese detainee, along with 5 others (including 1 from Laos) into a room and told them that they needed to sign a document agreeing to be deported to Libya. When they all refused, they were each put in a separate room and cuffed in (basically, solitary) in order to get them to sign it.” The email indicates that a Vietnamese man threatened with removal to Libya was moved from the facility today (May 7, 2025) at 7:00 am Eastern Time.

5. Accompanying Plaintiffs’ Motion as **Exhibit C** is a true and correct copy of an email exchange between Plaintiffs’ counsel and attorneys at Texas RioGrande Legal Aid regarding a Laotian man at risk of deportation to Libya or Saudi Arabia who already had been moved out of the Pearsall Detention Center in South Texas before counsel could meet with him.

6. Accompanying Plaintiffs’ Motion as **Exhibit D** is a true and correct copy of an email exchange between Plaintiffs’ counsel and Johnny Sinodis of Van Der Hout LLP in San Francisco regarding a Filipino client who was informed by ICE that he would be deported to Libya and whose counsel has not been provided written notice as required by the injunction. Email communications with ICE officers in San Antonio, Texas from Mr. Sinodis are attached to that email exchange.

7. Accompanying Plaintiffs’ Motion as **Exhibit E** is true and correct copy of an email exchange dated May 7, 2025 between Plaintiffs’ counsel and Defendants’ counsel seeking information about the flights to Libya and rumored flight to Saudia Arabia, expressing counsel about compliance with this Court’s preliminary injunction, and advising of the instant motion for a temporary restraining order.

8. Accompanying Plaintiffs' Motion as **Exhibit F** is true and correct copy of a May 7, 2025 post to the social media platform X by user @IntelWalrus.

I declare under penalty of perjury that the above information is true and correct to the best of my knowledge. Executed this 7th day of May 2025 at Brookline, Massachusetts.

By: s/ Trina Realmuto
Trina Realmuto